

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IKEA SUPPLY AG,

Plaintiff,

v.

CONVOY, INC., et. al.,

Defendants.

CIVIL ACTION NO. 1:24-cv-00051
HON. SARA L. ELLIS

MAGISTRATE JUDGE:
HON. MARIA VALDEZ

MOTION FOR DEFAULT JUDGMENT

Comes now Defendant, Hercules Capital, Inc., ("Hercules") by its undersigned attorneys, and for its Motion for Default Judgment, states as follows:

1. Hercules has previously filed Motions for Entry of Default (Document Nos. 64, 86, 99, 118) against the following defendants: American Transporters Inc.; Assurance Trucking LLC; Batths Transportation Company; Cehic Xpress Inc.; Connolly Trucking LLC; Delmore Transport LLC; DLB Management LLC; Dominican Trucking LLC; Eagle Speed Line Inc.; Enomid Trucking LLC; Everett Transportation Co.; Family First Enterprises, LLC; Fivejians LLC; FJ Trucking Services; Gilroy Williams Vasquez d/b/a JMB; Godette Global LLC; Heightened Sense Transport LLC; J Zuniga Trucking LLC; Josh & Sons Express LLC; M.A. Drummer LLC; Maintain Logistics Group LLC; McBarns American Logistics LLC; Ohio Global Transportation LLC; Parvinder Singh; Peter Transport Cargo LLC d/b/a Peter Transport Cargo; Ramin Noori d/b/a Noori Trucking; Ramos Brothers Transport LLC; Recio Transport Inc.; RMM Trucking, Inc; Shafer Logistics LLC; Somken Transport LLC; Sukhraj Singh Grewal d/b/a KJR Transit; T&D Transportation 6 LLC; TG Logistics LLC; Top Gear Transport LLC; Turbo Freight LLC; ZBT Logistics LLC; Alexander, Winton & Associates Inc.; Apex Capital Corp.; Basic Block Inc.; Carriernet Group Financial, Inc.; CD Consortium Corporation; Compass Funding Solutions, LLC;

Eagle Business Credit, LLC d/b/a Cashway Funding; Finger Lakes Logistics, Inc. d/b/a Integrated Logistics Associates; Operation Finance, Inc.; QP Capital LLC; Smarttrucker, LLC; Transam Financial Services, Inc.; and Transportation Finance Corporation (collectively the “Defaulted Defendants”).

2. The Court entered default against the Defaulted Defendants on May 7, 2024 (Document 113) and June 4, 2024 (Document 121).

3. Since the entries of default, none of the Defaulted Defendants have appeared, sought to vacate the defaults, or otherwise contacted the undersigned counsel.

4. Pursuant to the Federal Rules of Civil Procedure 55(b)(2), Hercules requests that this Court now enter a default judgment against the Defaulted Defendants, thereby barring the Defaulted Defendants from further participation in this matter and from seeking or obtaining any portion of the sums which have been interplead to the Clerk of the Court by the Plaintiff, IKEA Supply AG.

WHEREFORE, Hercules prays that this Court enter default judgment against the Defaulted Defendants, and thereby the Defaulted Defendants shall take nothing from the interplead funds.

Hercules Capital, Inc., Defendant

By: /s/ Rachel A. Mongiello
One of its Attorneys

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Pro hac vice
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was filed on June 14, 2024 with the Clerk of the court using CM/ECF, which will send notice to counsel of record:

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I further certify that I caused the foregoing document to be mailed by United States Postal Service
to the following parties:

American Transporters Inc.
7825 Banks Street
Justice, Illinois 60453

Assurance Trucking LLC
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Park Forest, IL 60566

Batths Transportation Company
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Attn: Balkar Singh

Cehic Xpress Inc.
9558 Gross Point Rd.
306A Skokie, IL 60076
Attn: Mehruoin Cehic

Connolly Trucking LLC
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Peotone, IL 68508

Delmore Transport LLC
9047 N 75th St. Unit C
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DLB Management LLC
5201 Deana Lane
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Dominican Trucking LLC
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Eagle Speed Line Inc.
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Attn: Omojevwe Idjighere

Everett Transportation Co.
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Family First Enterprises, LLC
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Fivejians LLC
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FJ Trucking Services
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Godette Global LLC
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Attn: Toshida Godette

Heightened Sense Transport LLC
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Attn: Jessie Cordero

J Zuniga Trucking LLC
5603 Plute Pass Street
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Josh & Sons Express LLC
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Maywood, IL 60153

M.A. Drummer LLC
4656 Maryland St.
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Maintain Logistics Group LLC
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Atlanta, GA 30339

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c/o Paul Osuagwu 5
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West Bloomfield, MI 48322

Ohio Global Transportation LLC
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Columbus, OH 43229

Ohio Global Transportation LLC
3037 David Ct.
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Parvinder Singh
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Ramin Noori
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Recio Transport Inc.
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Victorville, CA 92395

RMM Trucking, Inc.
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Oak Law, IL 60453
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Attn: Timothy Shafer

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Attn: Said Aden

Sukhraj Singh Grewal d/b/a KJR Transit
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Attn: Terrence Mack

TG Logistics LLC
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Attn: Terry Gilbert

Top Gear Transport LLC
Attn: David Sanders
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Turbo Freight LLC
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ZBT Logistics LLC
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/s/ Rachel A. Mongiello

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